

GORDON SILVER
MICHAEL V. CRISTALLI
Nevada Bar No. 6266
Email: mcristalli@gordonsilver.com
3960 Howard Hughes Pkwy., 9th Floor
Las Vegas, Nevada 89169
Tel: (702) 796-5555
Fax: (702) 369-2666
Attorney for Bautista

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

THE UNITED STATES OF AMERICA,

Plaintiff,

vs.

TIFFANY BAUTISTA,

Defendant.

CASE NO. 2:10-CR-307-LDG-RJJ

**MOTION TO EXTEND THE DATE FOR
SELF-SURRENDER**

(Expedited Treatment Request)

COMES NOW, Tiffany Bautista, Defendant herein, by and through her respective counsel Michael V. Cristalli, Esq., of Gordon Silver, and respectfully moves this Honorable Court to allow a brief extension of her self-surrender date.

This motion is based on the attached Memorandum of Points and Authorities and any evidence and/or argument that may be adduced should a hearing be required in this matter.

DATED this 9th day of May, 2013.

GORDON SILVER

/s/Michael V. Cristalli
MICHAEL V. CRISTALLI
Nevada Bar No. 006266
3960 Howard Hughes Pkwy., 9th Floor
Las Vegas, Nevada 89169
(702) 796-5555
Attorney for Bautista

1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 That the undersigned counsel and the Government have entered into several stipulations
3 to extend Ms. Bautista self- surrender date for the purpose of testifying in several cases. Ms.
4 Bautista was scheduled to testify in the matter of *United States of America v. Michael Shomer*,
5 case number: 2:10-CR-493-JCM-VCF. Trial in this matter had been pushed out several times and
6 was scheduled to go forward on March 25, 2013. However, the undersigned counsel learned for
7 the Government that Mr. Shomer had missed his court date and absconded to Europe and as
8 such, Ms. Bautista's testimony would no longer be needed.

9 Ms. Bautista is currently scheduled to self-surrender May 28, 2013, and would like to
10 request an extension of her self-surrender date until after July 9, 2013. She would like an
11 opportunity to attend her son's graduation and prepare him for his first day of school. In addition
12 she would like to use this time to put her finances and personal affairs in order and make sure her
13 son is taken care of while she serves her time.

14 Ms. Bautista has been compliant will all of this Court's requirements since her
15 sentencing.

16 **CONCLUSION**

17 Ms. Bautisa has continued to be complaint with this Court's requirements and
18 respectfully prays that this Honorable Court grant said motion to extend her self-surrender date.

19 Dated this 9th day of May, 2013.

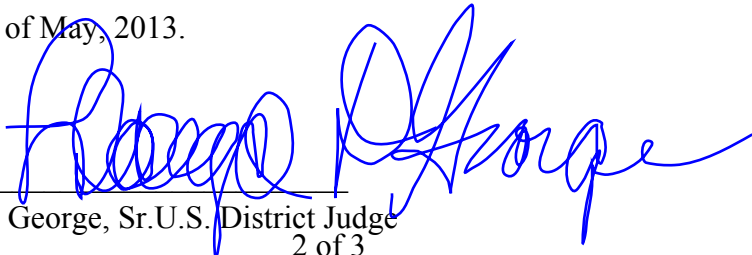
20 GORDON SILVER

21
22 **ORDER**

23 IT IS SO ORDERED that defendant's
24 date to self-surrender is extended to
25 Monday, July 15, 2013, at noon.

21 /s/Michael V. Cristalli
22 MICHAEL V. CRISTALLI
23 Nevada Bar No. 6266
24 3960 Howard Hughes Pkwy., 9th Floor
25 Las Vegas, Nevada 89169
26 (702) 796-5555
27 Attorney for Bautista

26 DATED this 23 day of May, 2013.

27
28 
Lloyd D. George, Sr.U.S. District Judge
2 of 3